

Law Offices of
Donna R. Newman
Attorney at Law
20 Vesey Street, Suite 400
New York, New York 10007
Tel. 212-229-1516
Fax. 212-593-1844
cell: 201-306-4369
donnanewmanlaw@aol.com

Member: N.Y. & N.J. Bar

September 20, 2023

BY ELECTRONIC MAIL & ECF

The Honorable Laura T. Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Smith, Yolanda Ratcliff*
23cr80 (LTS)

Dear Judge Swain:

With the consent of the Government and Ms. Ratcliff's Pretrial Services Officer Andrew Berglind, I write seeking an amendment to Ms. Ratcliff's conditions of bond to permit her to travel to New Jersey. Currently, her conditions of bond restrict her travel to the SDNY/EDNY. This amendment of her bond is sought to allow Ms. Ratcliff to seek employment in New Jersey where she has applied for positions with New Jersey based companies. To date, she has tried in vain to obtain employment but has been unsuccessful. This week she had positive feedback on her job applications from several employers whose main offices and training facilities are in New Jersey. In-person interviews and training for these companies would be in the company's main office. If she were to be hired, she anticipates that some part of the work week would require her to be present at the companies' main office. Accordingly, we ask for this amendment to allow Ms. Ratcliff to take advantage of these job opportunities.

Ms. Ratcliff is compliant with all conditions of her release. She was released on November 30, 2022, on a \$50,000 PRB and the following conditions: travel restricted to the SDNY/EDNY; surrender of travel documents and no new applications; supervision as directed by Pretrial Services; defendant to continue to seek employment. She was precluded from opening new bank accounts or new lines of credit without prior approval of Pretrial service and not permitted to possess potential identifying information of others except her immediate family.

Wherefore we respectfully request the Court amend Ms. Ratcliff's conditions of bond to allow her to travel to New Jersey. All other conditions of release will remain in full force and effect.

Respectfully submitted,

/s/

Donna R. Newman

Cc: PTS Andrew Berglind via email and ECF

AUSA's Rebecca Dell, Derek Wikstrom, Bhatia Kedar via email & ECF

Yolanda Ratcliff via email

The Court has reviewed the foregoing request for an amendment to Ms. Ratcliff's conditions of pretrial release. In light of Ms. Ratcliff's efforts to continue seeking employment, Ms. Ratcliff's travel restrictions are hereby amended to allow for travel into the District of New Jersey. DE 168 is resolved.

SO ORDERED.

/s/ Laura Taylor Swain, Chief USDJ

9/20/2023